Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Wireless E911 Location Accuracy Requirements	)	PS Docket No. 07-114
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket No. 94-102
	)	
Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling	)	
	)	
911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196

COMMENTS OF RCC CONSULTANTS, INC.

I. INTRODUCTION

RCC Consultants, Inc. ("RCC") provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007. Specifically, these comments address Section III.A ("Geographic Area Required for Compliance with Section 20.18(h)") of the NPRM in which the Commission tentatively concludes that this rule section should be amended to require wireless carriers to meet Phase II Wireless 9-1-1 position (or Automatic Location Identification "ALI") accuracy requirements at the Public Safety Answering Point ("PSAP") service area level. This requirement was proposed by the Associated Public Safety Communications Officials, Inc. ("APCO"). RCC offers the following comments in support of the tentative conclusion reached by the Commission in this matter.

II. DISCUSSION

RCC has closely followed the actions of the Commission in the proceedings that led to the accuracy and reliability requirements for the location of wireless 9-1-1 calls in CC Docket No. 94-102, "*Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling*

Systems". That Docket resulted in the development of OET-71 guidelines, to establish baseline performance levels for systems used to determine the location of wireless handsets from which emergency calls originate.

A. PSAP Level Accuracy Testing

RCC developed a *Wireless Location Accuracy Testing System, ComSite911,* in compliance with FCC OET-71 guidelines that has been successfully used in many areas of the country to assess the location accuracy of technologies employed by carriers *at the PSAP level*. ComSite911 was designed to:

- Move beyond anecdotal reports of location accuracy provided with wireless Phase II calls,
- Provide a "snapshot" of system performance across a diverse set of PSAP test areas to assess location accuracy,
- Provide a mechanism to independently test, verify and track performance,
- Allow PSAP managers to better understand location accuracy technology, and;
- Enable PSAP managers to work with carriers to achieve improvements in the accuracy of the data being received at the PSAP.

B. Results of PSAP Level Accuracy Testing

RCC has proven the value of its testing process in work performed for major cities and in conjunction with APCO's Project LOCATE. Test results show unequivocally the very real value in PSAP level accuracy testing. Test results suggest that location accuracy will differ between rural, suburban, and urbanized areas across different jurisdictions and wireless carriers. Averaging results by carrier and/or by degree of urbanization may provide general statements about a carrier's location technology implementation. However, these generalizations may result in misleading wireless E9-1-1 service expectations in any one PSAP service area.

C. RCC Concerns About Specific Statements Contained in the Notice

RCC understands the Commission's desire to deliberate the issue of PSAP level testing to ensure its decision is best for both the public and for the wireless carriers who provide the service. RCC strongly encourages the Commission to adopt its "tentative" conclusion that it should adopt a proposal made by the Association of Public-Safety Communications Officials-International, Inc. (APCO) to clarify Section 20.18(h) of the Commission's rules to require licensees subject to this rule to satisfy these standards at a geographical level defined by the coverage area of each respective local Public Safety Answering Point (PSAP).

RCC agrees with the Commission's opinion that there was insufficient empirical data to justify imposition of PSAP level testing in 2000 when the OET-71 guidelines were released. The Commission therein expressed a desire that OET-71 would "encourage E911 deployment by providing guidance to assist wireless equipment manufacturers, wireless carriers, and public safety personnel in designing, selecting, testing, and operating ALI systems." The Commission also therein expressed the desire that "the document be helpful to groups and organizations working to establish standard test conditions and protocols." Finally, the Commission felt that it would be "likely that testing and verification practices will evolve over time as representative models are developed and gain acceptance."[1]

Since the issuance of OET-71, some wireless carriers have spent the past seven years trying to convince the Commission:

- that the technology does not exist by which PSAP level testing can be performed;
- that the test footprint should be the entire wireless service area; and,
- that test of the "service area" should be considered in some instances to be valid even if that area is geographically large and may include multiple states.

[1] Federal Communications Commission, OET Bulletin No. 71 "Guidelines for Testing and Verifying the Accuracy of Wireless E911 Location Systems, April 12, 2000

The work performed by APCO and others in testing Wireless 9-1-1 ALI performance indicates that the positions of certain wireless carriers described above are indefensible.

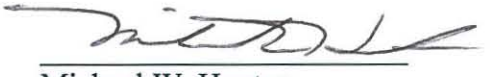
RCC supports APCO's contention that all parties must be motivated to make a strong comprehensive effort towards valid accuracy goals. Over the past several years, the topic of wireless ALI accuracy was reviewed in multiple forums such as ESIF and NRIC. The results of these reviews and recommendations have yet to offer the average wireless caller who dials 9-1-1 any assurance that public safety will have any credible information about their location, particularly if the callers are uncertain of their location or unable to provide the information.

III. CONCLUSIONS

The FCC was asked by APCO and others to provide clear instruction to the wireless carriers that location data delivered to the PSAP should improve to at least the parameters defined by the Commission in earlier proceedings on this matter.

RCC strongly encourages the Commission to move quickly to adopt PSAP level accuracy testing, and to impose a mandatory timeframe for such tests.

Respectfully Submitted,



Michael W. Hunter
President and Chief Executive Officer
RCC Consultants, Inc.
100 Woodbridge Center Drive, Suite 201
Woodbridge, NJ 07095-1125